

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In Re: )  
Deborah L. Heacock ) Case No. 14-41359-399  
                      ) Chapter 13  
Debtor.             )  
                      )

**DEBTOR'S MOTION TO PURCHASE AUTOMOBILE**

Comes now Debtor and for her Motion to Purchase Automobile states to the Court as follows:

1. Debtor filed for relief on February 28, 2014.
2. Debtor's 1997 Subaru has over 250,000 miles on it and needs extensive repairs to the motor and the exhaust system. Debtor's mechanic does not recommend spending the funds to repair the vehicle based upon it's current condition. Debtor needs to replace the vehicle.
3. Debtor now wishes to purchase a vehicle for a purchase price not to exceed \$20,000.00 and a monthly payment not to exceed \$300.00 per month.
4. Debtor has the same employment. Her expenses have changed because one of her children is now in college and she does not have his private school expense any longer.  
Amended Schedules I and J have been filed.

WHEREFORE, Debtor respectfully prays that her Motion to Purchase Automobile be granted and that the Court grant Debtor permission to purchase and finance an automobile, and for such other and further relief as this Court deems just and proper.

**NOTICE OF FILING OF MOTION TO INCUR DEBT**

PLEASE TAKE NOTICE that the Debtor has filed a Motion to Purchase an

Automobile. Any responsive pleading in opposition to the above Motion must be filed in writing with the Clerk of the United States Bankruptcy Court, 111 South 10<sup>th</sup> Street, 4th Floor, St. Louis, Missouri 63102, and with the Chapter 13 Trustee at the address indicated below, within 21 days of the date of this Notice. If no responsive pleading is filed, the motion may be granted without further notice to any party upon submission of an order from the Debtor. If a response is filed, this matter will be set for hearing upon subsequent notice.

Kimber H. Baro 33690MO

/s/Kimber H. Baro  
Attorney for Debtor  
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Florissant, MO 63031  
(314) 896-1999  
(314) 942-7195 FAX  
[Kbaro@barolawfirm.com](mailto:Kbaro@barolawfirm.com)

**CERTIFICATE OF SERVICE**

A copy of the foregoing was mailed, postage prepaid, on May 29, 2015 to :

John V. LaBarge, Jr.  
Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, MO 63143

All Creditors listed on attached Matrix.

/s/ Kimber H. Baro

Bank of America  
P.O. Box 982235  
El Paso, TX 79998

Bank of America  
P.O. Box 15290  
Wilmington, DE 19850-5290

Bank of America  
P.O. Box 25118  
Tampa, FL 33622-5118

Bank of America, N.A.  
4161 Piedmont Parkway  
Greensboro, NC 27410

CitiCards CBNA  
701 East 60th Street  
Sioux Falls, SD 57104

Citimortgage, Inc.  
P.O. Box 6243  
Sioux Falls, SD 57117-6243

GE/JCPenney  
PO Box 965007  
Orlando, FL 32896

GECRB/Amer Eagle  
PO Box 965005  
Orlando, FL 32896

GECRB/Sams  
P.O. box 965005  
Orlando, FL 32896-5005

Macy's Bankruptcy Processing  
P.o. Box 8053  
Mason, OH 45040

St. Louis County Collector of Revenue  
41 South Central Avenue  
Saint Louis, MO 63105

Vantage Credit Union  
4020 Fee Fee Road  
Bridgeton, MO 63044

World's Foremost Bank  
4800 NW 1st Street  
Suite 300  
Lincoln, NE 68521